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13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 DWIGHT MARSHON WHITE, ) Case No: 2:15-cv-01587-JCM-NJK  
16 Plaintiff )  
17 v. )  
18 ) **DEFENDANT'S MOTION FOR**  
19 ) **EXTENSION OF TIME TO FILE CROSS-**  
20 ) **MOTION TO AFFIRM**  
21 CAROLYN W. COLVIN, Acting )  
22 Commissioner of Social Security, )  
23 Defendant. )  
24 )  
25 )  
26 )

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (the Commissioner), moves, with the approval of this Court, for an extension of time to file her Cross-Motion To Affirm by sixty days from December 31, 2015 to February 29, 2016. This is the Commissioner's first request for an extension.

There is good cause because the Commissioner's counsel is currently experiencing a heavy workload and has been out of the office on approved use-or-lose leave. Further, counsel is in the midst of a large District Court discovery production in an employment case in the District of Arizona and has a Ninth Circuit brief due to her reviewer in January. The Commissioner makes this request in good faith and needs additional time to respond to the nine issues Plaintiff Dwight Marshon White (Plaintiff) raised in his Motion For Judgment On The Pleadings, as well as the forty pages of additional evidence Plaintiff attached to his brief. Plaintiff opposes the Commissioner's request for an extension.

Respectfully submitted,

Date: December 31, 2015

DANIEL G. BOGDEN  
United States Attorney  
BLAINE T. WELSH  
Chief, Civil Division

By: /s/ April A. Alongi  
APRIL A. ALONGI  
Special Assistant United States Attorney

Attorneys for Defendant

IT IS SO ORDERED.

DATE December 31, 2015

THE HONORABLE NANCY J. KOPPE  
United States Magistrate Judge

## DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused a copy of the Defendant's Motion For Extension Of Time To File Cross-Motion To Affirm to be served, via U.S. First-Class Mail, on:

DWIGHT WHITE  
3370 St Rose Parkway, Apt. 1728  
Henderson, Nevada 89052

Date: December 31, 2015

DANIEL G. BOGDEN  
United States Attorney  
BLAINE T. WELSH  
Chief, Civil Division

By: /s/ April A. Alongi  
APRIL A. ALONGI  
Special Assistant United States Attorney

Attorneys for Defendant